

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
Civil Action No.: 7:23-CV-897**

IN RE:)
)
CAMP LEJEUNE WATER LITIGATION)
)
This Pleading Relates to:)
)
ALL CASES.)
)
)

**TABLE OF EXHIBITS
IN SUPPORT OF PLAINTIFFS' RESPONSE TO DEFENDANT UNITED STATES'
MOTION TO EXCLUDE PLAINTIFFS' PHASE I EXPERT TESTIMONY IN SUPPORT
OF USING ATSDR'S WATER MODELS TO DETERMINE EXPOSURE LEVELS FOR
INDIVIDUAL PLAINTIFFS**

- Ex. 1** – October 8, 2003 Sign-in Sheet
- Ex. 2** – 2017 ATSDR Public Health Assessment
- Ex. 3** – March 13, 2025 Deposition of Alexandros Spiliotopoulos PhD
- Ex. 4** – ATSDM D5447-17: Standard Guide for Application of a Numerical Groundwater Flow Model to a Site-Specific Problem
- Ex. 5** – ATSDR Tarawa Terrace Report Chapter I: Parameter Sensitivity, Uncertainty, and Variability Associated with Model Simulations of Groundwater Flow, Contaminant Fate and Transport, and Distribution of Drinking Water
- Ex. 6** – Clement, T.P. Author's Reply to Comment on Comment on Complexities in Hindcasting Models, Ground Water 50:1 (2012)
- Ex. 7** – February 21, 2008 Clement Email to Morris Maslia
- Ex. 8** – February 18, 2009 Clement Email to Morris Maslia
- Ex. 9** – March 20, 2025 Deposition of Remy Hennes PhD
- Ex. 10** – April 8, 2025 Expert Report of Judy LaKind PhD re Plaintiff Frank Mousser
- Ex. 11** – Leonard F. Konikow PhD Curriculum Vitae
- Ex. 12** – Leonard F. Konikow PhD Publications List

- Ex. 13** – December 2004 AH Environmental Consultants Report
- Ex. 14** – August 6, 2024 Deposition of Dan Waddill
- Ex. 15** – November 24, 2008 Navy Letter to ATSDR
- Ex. 16** – January 14, 2025 Rebuttal Report of David Sabatini PhD
- Ex. 17** – Maslia, et al., “Reconstructing Historical Exposures to Volatile Organic Compound-Contaminated Drinking Water at a U.S. Military Base,” *Journal of Water Quality Exposure & Health* (2009)
- Ex. 18** – Maslia, et al., “Reconstructing Historical VOC Concentrations in Drinking Water for Epidemiological Studies at a U.S. Military Base: Summary of Results,” *Water* (2016)
- Ex. 19** – Suarez-Soto, et al., “Using Uncertainty Analysis to Reconstruct Historical Tetrachloroethylene (PCE) Exposure for an Epidemiological Study,” *ASCE World Environmental and Water Resources Congress* (2007)
- Ex. 20** – Guan, et al., “Historical Reconstruction of Groundwater Contamination at Contaminated Sites and Uncertainty Analysis,” *ASCE World Environmental and Water Resources Congress* (2010)
- Ex. 21** – Guan, et al., “A Methodology to Reconstruct Groundwater Contamination History with Limited Field Data,” *ASCE World Environmental and Water Resources Congress* (2009)
- Ex. 22** – Wang, et al., “Tetrachloroethylene (PCE) Exposure Reconstruction for an Epidemiological Study: The Effect of Historical Supply-Well Schedule Variation on Arrival Time,” *Proceedings of the World Environmental & Water Resources Congress* (2007)
- Ex. 23** – Final Report of the 2005 Expert Peer Review Panel
- Ex. 24** – Final Report of the 2009 Expert Peer Review Panel
- Ex. 25** – U.S. EPA, *Guidance for Conducting External Peer Review of Environmental Regulatory Modeling*. EPA Report 100-B-94-001, July 1994
- Ex. 26** – Assessing Model Fit with Sampling Data at TT Water-Supply Wells and the WTP
- Ex. 27** – Reilly & Harbaugh, *Guidelines for Evaluating Ground-Water Flow Models* (2004)
- Ex. 28** – ATSDR Tarawa Terrace Report Chapter C: Simulation of Groundwater Flow
- Ex. 29** – ATSDR Hadnot Point/Holcomb Blvd Report Chapter A, Supplement 4: Simulation of Three-Dimensional Groundwater Flow
- Ex. 30** – Kumar, “An Overview of Commonly Used Groundwater Modelling Software,” *Int’l Journal of Advanced Research in Science, Engineering and Technology* (2019)
- Ex. 31** – Pietrzak, “Modeling migration of organic pollutants in groundwater — Review of available software,” *Environmental Modelling & Software* (2021)

- Ex. 32** – U.S. EPA, Science Inventory: Modular 3-D Transport model
- Ex. 33** – U.S. EPA, “Guidance on the Development, Evaluation, and Application of Environmental Models” (2009)
- Ex. 34** – Jang and Aral, “Density-Driven Transport of Volatile Organic Compounds and Its impact on Contaminated Groundwater Plume Evolution,” Journal of Transport in Porous Media (2007)
- Ex. 35** – Jang and Aral, “Effect of Biotransformation on Multi-species Plume Evolution and Natural Attenuation,” Int’l Journal on Transport in Porous Media (2008)
- Ex. 36** – Jang and Aral, “Multiphase Flow Fields in In-Situ Air Sparging and Its Effect on Remediation,” Int’l Journal on Transport in Porous Media (2009)
- Ex. 37** – Jang and Aral, “In-Situ Air Sparging and Thermal Venting in Ground Water Remediation,” Chapter 11 in Groundwater Quality and Quantity Management (2011)
- Ex. 38** – Jang and Aral. 2005, “Three-Dimensional Multiphase Flow and Multispecies Transport Model TechFlowMP,” Georgia Institute of Technology, Multimedia Environmental Simulations Laboratory, Report MESL-02-05, Sept. 2005
- Ex. 39** – Gangadharan, AC, et al., Leak Prevention in Underground Storage Tanks: A State-of-the-Art Survey, at 23, U.S. Environmental Protection Agency, 1987, Report No. EPA-600/2-87/018
- Ex. 40** – April 29, 2010 Camp Lejeune Community Assistance Panel Meeting Transcript
- Ex. 41** – ATSDR Hadnot Point/Holcomb Blvd Report Chapter A, Supplement 2: Development and Application of a Methodology to Characterize Present-Day and Historical Water-Supply Well Operations
- Ex. 42** – Brookfield, et al., “Estimating Groundwater Pumping for Irrigation: A Method Comparison,” Groundwater (2024)